July 27, 2016

Mr. Mark J. Hague
Regional Administrator
U.S. Environmental Protection Agency
Region 7
11201 Renner Blvd.
Lenexa, Kansas 66219

RE: Risk-Based PCB Cleanup Plan
PSC Metals, Inc., Festus, Missouri

Dear Mr. Hague:

On behalf of PSC Metals, Inc., Amec Foster Wheeler is submitting the enclosed Risk-Based PCB Cleanup Plan for your review and approval in accordance with the requirements of the Toxic Substances Control Act regulations, 40 CFR 761.61(c).

Please contact Mr. William Hansard of PSC Metals at (615) 271-3468 with any questions, or you may contact the undersigned at (207) 828-3459 or at jeffrey.brandow@amecfw.com if you require further information.

Yours truly,

Amec Foster Wheeler Environment & Infrastructure, Inc.

Jeffrey Brandow
Associate Engineer

cc: Michael Dandurand, P.E., USEPA R.7
William Hansard, PSC Metals

Encl.

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File

Risk-Based PCB Cleanup Plan
Former Baler Area
PSC Metals
Festus, Missouri

Prepared for:
PSC Metals. Inc.

Prepared by:
AMEC Foster Wheeler
15933 Clayton Road, Suite 215
Ballwin, MO 63011

Amec Foster Wheeler Project No. 242415100

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IMPORTANT NOTICE

This report was prepared exclusively for PSC Metals, Inc., by Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler). The quality of information, conclusions and estimates contained herein is consistent with the level of effort involved in Amec Foster Wheeler's services and based on: (i) information available at the time of preparation, (ii) data supplied by outside sources and (iii) the assumptions, conditions and qualifications set forth in this report. This report is intended to be used by PSC Metals only, subject to the terms and conditions of its contract with Amec Foster Wheeler. Any other use of, or reliance on, this report by any third party is at that party's sole risk.

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ABBREVIATIONS AND ACRONYMS

CFR	Code of Federal Rules
CoC	Chain of Custody
Dup	Field Duplicate Sample
EPA	U.S. Environmental Protection Agency
GPS	Global Positioning System
mg/kg	milligrams per kilogram (equivalent to parts per million)
PCB	Polychlorinated Biphenyl
ppm	parts per million
RB	Rinsate Blank
RSL	Regional Screening Level
TSCA	Toxic Substances Control Act
Teklab	Teklab Environmental Laboratory
QC	Quality Control

1.0 INTRODUCTION

This Risk-Based PCB Cleanup Plan is being submitted to the United States Environmental Protection Agency (EPA) Region 7, to describe a plan for addressing PCB remediation waste at the PSC Metals, Inc., site in Festus, Missouri.

1.1 Overview of the Remedial Action

PSC Metals has determined that PCB contamination exists in the vicinity of a former scrap metal baler operation at the site. The former baler was used to compress scrap metal into bundles of acceptable size and shape for transport to an off-site recycling furnace. PCBs have been detected in the concrete slabs and pads associated with the baler operation. Lower levels of PCBs have also been detected in shallow soils adjacent to the former baler structure. PSC Metals is proposing to conduct remediation of the residual PCB contamination associated with the former baler area.

Concrete, soil, and debris with total PCB concentrations exceeding the site-specific risk-based cleanup level of 9.4 milligrams per kilogram (see Section 5.1 of this Plan) will be consolidated on site and covered with a minimum of four-inch thick concrete pavement, except that soil, concrete, and debris containing total PCB concentrations greater than or equal to 50 milligrams per kilogram (mg/kg, or parts per million [ppm]) will be disposed of at a TSCA-authorized disposal facility. Future use of the site will be restricted to industrial/commercial activities through application of a deed restriction conforming to the requirements of the Missouri Environmental Covenants Act.

1.2 Organization of the Work Plan

A brief background and history of the site is presented in Section 2 of this Work Plan; the site characterization sampling methodology is described in Section 3; characterization sampling results and a summary of the nature and extent of the PCB contamination to be addressed by this Plan are described in Section 4; our proposed approach for handling and disposal of PCB contaminated material and documentation of the cleanup is presented in Section 5; and Section 6 provides a schedule for implementation.

2.0 SITE BACKGROUND

This section describes the site location, operational history, and current status.

2.1 Site Description and Setting

The Site is located at the intersection of 12th Street and Vine in Festus, Missouri. It is a rectangular 9-acre area, oriented primarily north-south, along the boundary that separates the cities of Festus and Crystal City, Missouri (**Figure 1-1**). The Site is primarily a retail scrap metal recycling operation, recycling items such as automobiles, sheet metal, siding, and empty appliance shells. The scrap is transported to a St. Louis facility for processing. Metal baling, shredding and torch-cutting operations are no longer performed at the site, therefore, structures and equipment associated with these processes are being removed. The focus of this Cleanup Plan will be on the northern end of the site (**Figure 1-2**) where metal scrap was once compressed by a baler for transport offsite.

The soils in this portion of the site consist of rubble, stone, sand, and concrete fill material ranging in thickness from 4 to 16 feet, overlying gray silty clay. Much of the area is currently covered by concrete pavement.

2.2 Operational History

The approximate subject property chronology is as follows:

- Pre-1946 – The area was used as a sand quarry;
- 1946 – The subject property began operation as a scrap yard;
- 1960 – The non-ferrous warehouse was constructed;
- 1970 – The maintenance building was constructed;
- 1972 – The baler building was constructed; the baler was decommissioned in 2006
- 1974 –The old office building was demolished in 1974 and the current building erected; renovations/expansion in 1989;
- 1975 – The shear and support structures were constructed;
- 1982 – The railroad scale house on the lower eastern one-third of the property was constructed;
- 1984 – The current torch cutting structure was constructed;

- 2005 – The current shredder building was installed;
- 2005 to 2012 – The fixed base shredder and shear operated
- 2011 – Shapiro Brothers was acquired by PSC Metals

2.3 Current Status

The site is currently used as a collection and processing yard for scrap metal that is then transported to other PSC Metals yards in St. Louis for recycling. This site use is anticipated to continue for the foreseeable future.

The Baler superstructure and part of the Baler pad have been partially demolished to remove clean (non-PCB) metal equipment and building materials and to allow construction of a concrete access road in 2015 through part of the former building footprint. The remainder of the former Baler pad, Baler sump/substructure, and foundation remain. The sump and an access tunnel into the sump area were pumped of oily water to facilitate concrete and tunnel characterization sampling. The oil and water was disposed in accordance with the requirements of 40 CFR 761. Concrete and soils known or suspected to contain PCBs were temporarily stockpiled on site in a manner consistent with 40 CFR 761.65(c)(9), then transported to a TSCA-approved facility for disposal.

The current plan is to consolidate the concrete Baler sump/substructure, foundation, and Baler area soils and construction materials containing greater than 9.4 ppm and less than 50 ppm total PCBs within the footprint of the Baler sump area, and install a new concrete pavement cap over the area. The concrete pavement cap will prevent direct contact with, and minimize the potential for migration of, the residual PCBs in that material. The stainless steel tunnel (fabricated from rail tanker cars) will also be cut into sections and placed within the Baler sump area prior to installation of the concrete pavement cap.

3.0 SITE CHARACTERIZATION

Extensive sampling has been completed in order to define the extent of PCB contamination in soil and concrete at the site. This section provides an overview of types of sampling conducted, and sampling methods.

3.1 Overview of Sampling Efforts

Site characterization sampling was completed by Amec Foster Wheeler during May – August, 2015. This included:

- Sampling of concrete in the Baler building area on a 10-foot grid. This included the former baler pad and pedestals, the concrete basin floor, and the basin walls.
- Sampling soil over a utility tunnel to evaluate tunnel removal requirements.
- Sampling of fill and soil material directly under the concrete pads following their removal.
- Sampling soil around the perimeter of the concrete pads to delineate impacted soil.

Representative site photographs of areas sampled are provided in **Appendix A**.

3.2 Sampling and Analytical Methodology

The following sections describe the sampling procedures and analytical methods used for site characterization sampling.

3.2.1 Grab Samples/Hand Augering

Shallow soil samples were collected as grab samples using stainless steel spoons and bowls or a stainless steel hand auger. Non-disposable implements were decontaminated after collecting individual samples.

3.2.2 Soil Sample Screening

The field geologist made observations for visible indications of chemical staining and noted any odors associated with the samples in the field notes.

3.2.3 Soil Sample Collection and Handling

The field geologist used disposable, nitrile gloves for handling soil samples. To minimize the potential for cross-contamination, the gloves were replaced between sample intervals. Soil from the interval selected for analysis was placed in either 4-ounce or 8-ounce jars provided by the laboratory. Each sample was immediately sealed and placed in a cooler with ice.

Labels were affixed to sample containers and the samples given unique sample identifications based upon the borehole location and depth. The samples were packed in coolers with ice until delivered to the laboratory for analysis. Chain-of-custody (CoC) records were completed and accompanied each cooler of samples to document sample custody.

3.2.4 Concrete Sampling

The sampling method was to collect a sample from the top 1-inch of the concrete for concrete characterization using a drill and bit with approximately 1-inch deep, multiple 1-inch diameter holes, with drill/coring bits. Re-usable sampling tools were decontaminated between each sample location. Sample collection was performed on a 3 meter (10 foot) grid. Dust from the coring or drilling was collected into 8-oz sample jars. The concrete samples were then packaged for transport to the lab.

3.2.5 Laboratory Analysis

Investigation samples were extracted using EPA Method 3550B, and analyzed by EPA Method 8082 for total PCBs.

All investigation sample analyses were performed by Teklab Environmental Laboratory (Teklab). Teklab has been accredited in accordance with National Environmental Laboratory Accreditation Conference (NELAC) Standards. Teklab provided all containers, preservatives, labels, and CoC forms utilized for sample collection.

3.2.6 Field Documentation

Representative sample locations were photo-documented and described in field notes. A GPS was used to locate selected landmarks and sample points, where practicable. Field sketches and measurements to known landmarks were created.

The established sample identification system identifies the sample locations (grid number and depth). An example identification for one location is (B1-01-0 to 6 in): Grid Number-Sample Number-Depth (in inches).

Quality control (QC) samples were identified as field duplicate (dup) or rinsate blank (RB, equipment blank) samples.

A duplicate was collected at a rate of at least one for every 20 samples analyzed by the laboratory using a confidential sample identification only identified in the field notes.

3.3 Equipment Decontamination Procedures

Any equipment used by the remedial contractor or Amec Foster Wheeler (sampling or excavating equipment) was decontaminated for potential PCBs using procedures outlined in 40 CFR 761.79(c)(2), by cleaning surfaces that had contacted PCB-contaminated materials using an appropriate solvent.

4.0 SAMPLING RESULTS

This section describes the sample results for:

- Concrete prior to demolition to determine methods of disposal and to segregate areas by concentration
- Soil testing over tunnel area prior to tunnel demolition
- Soil and backfill material testing under concrete pad after demolition
- Soil sampling in areas of the proposed road construction for site redevelopment

4.1 Pre-Demolition Concrete Samples

Sampling was performed on a 3-meter by 3-meter (approximately 10-foot by 10-foot) square grid, in accordance with the sampling procedures outlined in 40 CFR 761.265. The areas sampled are shown on **Figure 4-1,** along with the analytical results for total PCBs. The concrete sampling results by individual PCB Aroclor are tabulated on **Table 4-1**.

As shown on **Figure 4-1,** the data indicate that the area of highest PCB impact, over 50 ppm, was on the north area of the concrete pads (Slab B and part of Slab C). The majority of the concrete evidenced low levels of PCBs, generally less than 10 ppm. Of the 26 samples collected from the baler pads, only 6 contained PCBs at 50 ppm or greater, while 9 samples contained less than 1 ppm total PCBs.

4.2 Pre-Demolition Soil Samples from Over Tunnel

Two soil samples were collected from soil overlying the buried railcar (tunnel). This soil will require excavation as part of planned removal of the tunnel.

A discrete soil sample, labeled S-1, was collected over the north end of the tunnel. Soil in this area was uniform silty material until refusal at about 8 inches. Other areas over the tunnel were covered with gravel and a thin veneer of soil. Due to the shallow soil depth before hitting gravel (about 2 -3 inches), a composite soil sample was collected at locations S-2, S-3, and S-4. The

total PCB concentrations in these two soil samples (S-1 and the S-2 through S-4 composite) were low, at 1.4 ppm and 0.5 ppm, respectively.

Three samples were also collected of the rubber liner material on the inside of the tunnel, and an additional three samples were collected from the concrete floor of the tunnel. The total PCB concentrations in the rubber liner ranged from 10.2 ppm to 47 ppm. The concrete floor samples ranged from 0.18 ppm to 2.0 ppm total PCBs.

Figure 4-2 shows the locations and PCB analytical results for all of the samples associated with the tunnel.

4.3 Samples Under Concrete Pads – After Demolition

To expedite site road construction activities in the vicinity of the concrete pad and pedestal areas, the western-most concrete pads were removed and segregated into three separate stockpiles: <1 ppm total PCBs, >1 to <50 ppm, and > 50 ppm.

After the concrete pads were removed, the top 6 inches of material directly beneath the pads was sampled. The material encountered under the pads was a mixture of small-size gravel, soil, and white concrete cuttings/powder from the removal of pads. A total of 16 samples were collected. Of these, 14 samples, 88 percent, were < 1 ppm. Two samples on the north end contained 1.5 ppm and 2.7 ppm total PCBs. The soils containing > 1 ppm were removed to a depth of 1 foot and the material stockpiled on site.

4.4 Soil Sampling in Road Construction Area

To expedite site road construction activities that were planned for the area near the Baler concrete pads, soil was sampled for PCBs on a 10 foot grid. Sampling was first performed along the edge of the concrete pad, and after this perimeter sampling was done, the grid was expanded out 10 feet from perimeter points that were >1 ppm PCBs.

Figure 4-3 illustrates the sample grids, and **Table 4-2** summarizes the sample results. Soils containing PCBs at 10 ppm or greater were excavated from within the footprint of the planned access road, as shown on **Figure 4-3**. Impacted soil was placed into separate stockpiles of < 50 ppm, and > 50 ppm soils.

4.5 Sampling of Baler Basin Concrete

Characterization sampling of the Baler basin concrete (floors/subfloors and walls) for PCBs was conducted on a 10 foot grid. Figures 4-4 to 4-8 show the sampling locations and total PCB results. PCB concentrations in the Baler basin concrete were less than the proposed target level in all but one sample (BBEW-04, located on the east wall of the basin).

5.0 REMEDIATION PLAN

This section describes the cleanup objectives and removal plan for addressing the remaining PCBs in soil and concrete in the vicinity of the former Baler building.

5.1 Objectives, Cleanup Levels, and General Approach

The objective of this remediation plan is to control risks due to possible exposure to PCBs under an industrial use scenario, consistent with the current and expected future property use. The target cleanup level is based on the May 2016 U.S. Environmental Protection Agency Regional Screening Levels (EPA RSLs) for site workers, adjusted to a carcinogenic risk level of 1×10^{-5}. For total PCBs, the proposed cleanup level is 9.4 ppm.

The remedial strategy will be to consolidate and cover soils, concrete and debris on site that exceed the cleanup level, but are below 50 ppm total PCBs. The cover will consist of concrete pavement with a minimum thickness of four inches.

Materials containing total PCBs at 50 ppm or greater will be transported to a TSCA-authorized landfill for disposal.

Access to the property is monitored by PSC personnel during business hours, and is controlled by fencing, gates, and electronic security measures after business hours to prevent unauthorized access. As an additional component of the remedy, PSC will establish a deed restriction on the property to prohibit future residential use. The deed restriction will be prepared in conformance with the template provided by the Missouri Department of Natural Resources under the Missouri Environmental Covenants Act.

5.2 Specific Elements of Removal Plan

The plan for PCB remediation at the site is generally shown on Figure 5-1, and is described in the following sections.

5.2.1 Site Preparation and Control

Site access is already strictly controlled by security fencing and gates. Prior to commencing work, the remediation area will be demarcated with temporary fencing and/or signs.

5.2.2 Methods of Handling and Disposal of Excavated Concrete and Soil

Based on the results of the characterization sampling completed to date, only one portion of the former building slab and one soil sample contained PCBs at a concentration of 50 ppm or greater. The concrete slab was saw-cut so that concrete containing total PCBs of 50 ppm or greater could be segregated from remaining materials. The area surrounding the soil sample was also excavated outward to sample points that were below 50 ppm total PCBs. These segregated materials were temporarily stockpiled in a designated area of the site by placing them on a double layer of 6-mil plastic liner, and covering with an additional layer of liner material. Temporary stockpiles containing total PCBs at 1 ppm or greater were subsequently removed from the site for disposal at a TSCA-authorized disposal facility.

Based on the soil sampling results summarized on Table 4-2 and Figure 4-3, the soils in the former baler area that were found to exceed the proposed cleanup level have been removed and properly disposed at an offsite TSCA-authorized disposal facility, or are already capped by concrete pavement and require no further action.

5.2.3 Verification Sampling

Verification sampling is necessary in a limited area around the existing concrete pavement to confirm that all areas exceeding the cleanup level will be covered by concrete. Sampling is proposed near soil samples CS20 and CS30 along the western edge of the existing concrete pavement, and near soil sample CS14 along the eastern edge of pavement (see Figure 4-3). Samples will be collected in these areas at a 10-foot spacing along the edge of the existing concrete pavement, and will be taken from the top six inches of soil at each location. Based on results, a decision will be made to either excavate and consolidate any soils found to exceed the cleanup level within the former Basin area prior to capping, or to cap them in place by expanding the existing concrete pavement area.

5.2.4 Former Baler Closure

The existing concrete in the former Baler Basin has been determined to all be less than 50 ppm total PCBs, and all but one sample was found to be below the proposed cleanup level. PSC proposes to leave the concrete in place and install a concrete pavement cap over the former basin area as shown on Figure 5-1.

5.2.5 Former Tunnel Removal

The former tunnel leading into the lower chamber of the Baler Basin was originally created by burying three rail car tanks end-to-end, resulting in a passageway approximately 70 feet in

length and 10 feet in diameter. Two of the three former tanks were lined with a rubber-like material. A thin layer of concrete was placed on the bottom of the tunnel to provide a flat floor. Samples of the rubber liner were found to contain PCBs above the proposed cleanup level, but are below 50 ppm total PCBs. The concrete floor contained very low levels of PCBs, below the cleanup level. PCB concentrations in the soils overlying the tunnel were also below the cleanup level.

PSC will excavate the tunnel, cut the former tanks into manageable sections, and place the pieces into the Baler Basin where they will be capped in place. The footprint of the former tunnel will be backfilled with onsite soil that does not contain PCBs above the cleanup level, and additional imported clean soil as necessary, to fill the area to match surrounding grade.

5.2.6 Documentation and Recordkeeping

At the completion of the project, records of the cleanup activities will be compiled into a remedial action completion report. This report will be maintained in the project files, and available for inspection upon request, for a period of 5 years.

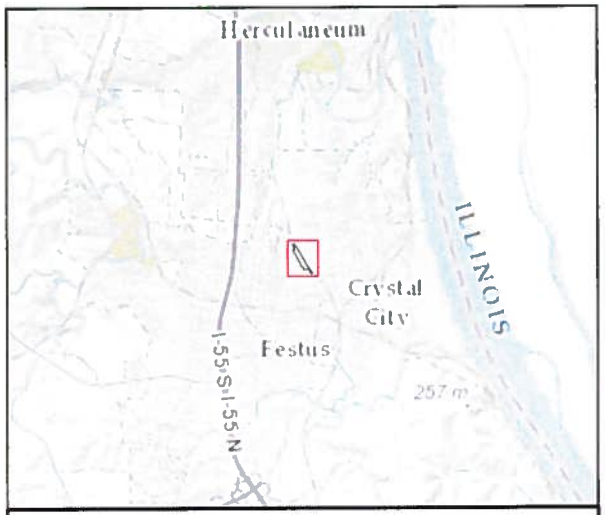
5.2.7 Cap Maintenance, Inspection, and Reporting

The concrete pavement placed over areas exceeding the cleanup level will be maintained to prevent access to the contaminated materials and to reduce releases of PCBs to groundwater or air to the extent reasonably possible. PSC will conduct regular visual inspections of the concrete cap, and will annually prepare an inspection report that will be submitted to EPA Region 7. The annual report will document the condition of the concrete cap, describe maintenance and repair activity conducted during the prior year, and make recommendations for maintenance or repairs of the cap for the upcoming year.

5.2.8 Schedule

PSC Metals is prepared to initiate the work described in this work plan within 30 days of receiving all necessary regulatory approvals. It is anticipated that field activities will be completed approximately 90 days after project initiation.

Figures



Area of Detail

Legend

PSC Metals

Former Baler Area

N

200 100 0 200

Feet

Figure 1-1.
Site Location
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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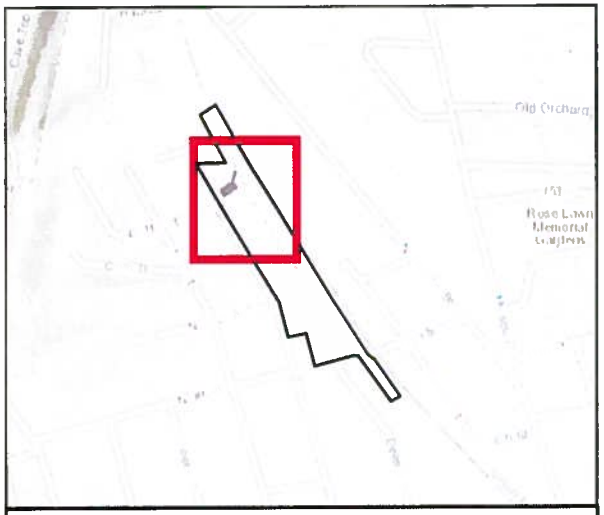
Path: K:\1_GIS\3250125\2_Shapiro_Metalsa_MXD\1508\Figure 1-1 PSC Metals Site Location.mxd



Area of Detail

Legend

- Former Baler Area
- PSC Metals
- Tunnel (Buried Rail Car)

N

100 50 0 100 Feet

(Approx. scale)

Figure 1-2.
Former Baler Area
Site Investigation and Remediation Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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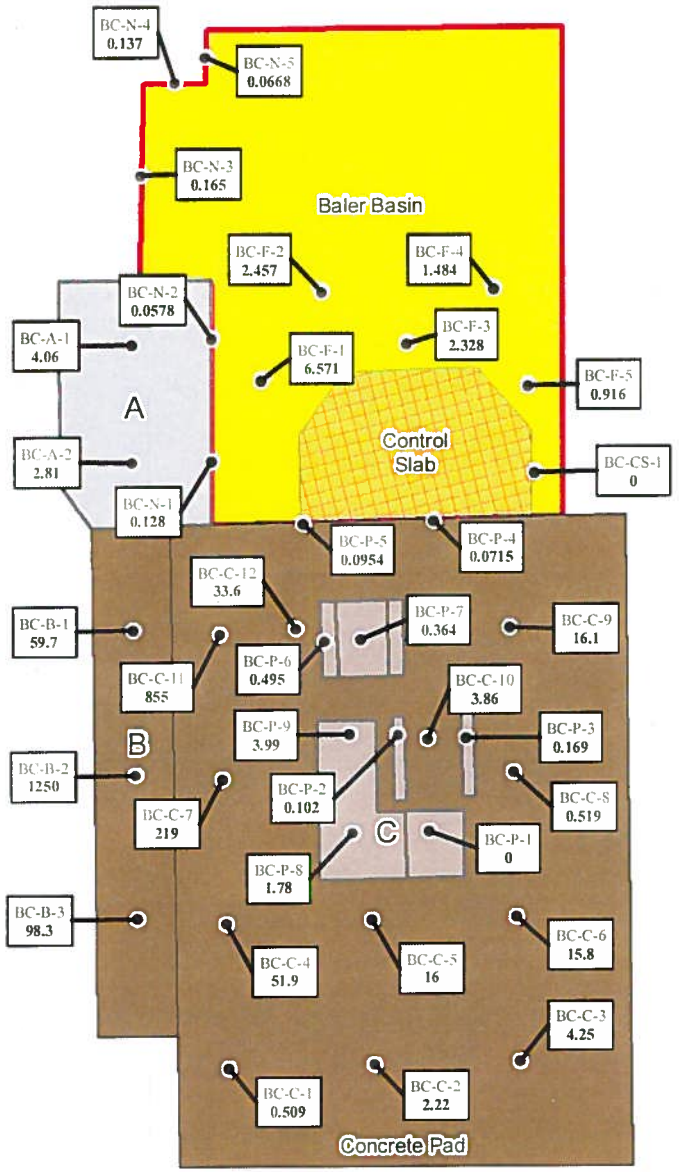

Legend

- Sample Location
- Baler Basin
- Concrete Pad (Slab A)
- Control Slab (above basin)
- Former Bldg Slab (Slab B and C)

Notes: All samples collected May 6-7, 2015. Results for total PCBs shown in parts per million (ppm)

10 5 0 10
Feet

Figure 4-1.
Pre-Demolition Concrete Sample Results - Total PCBs
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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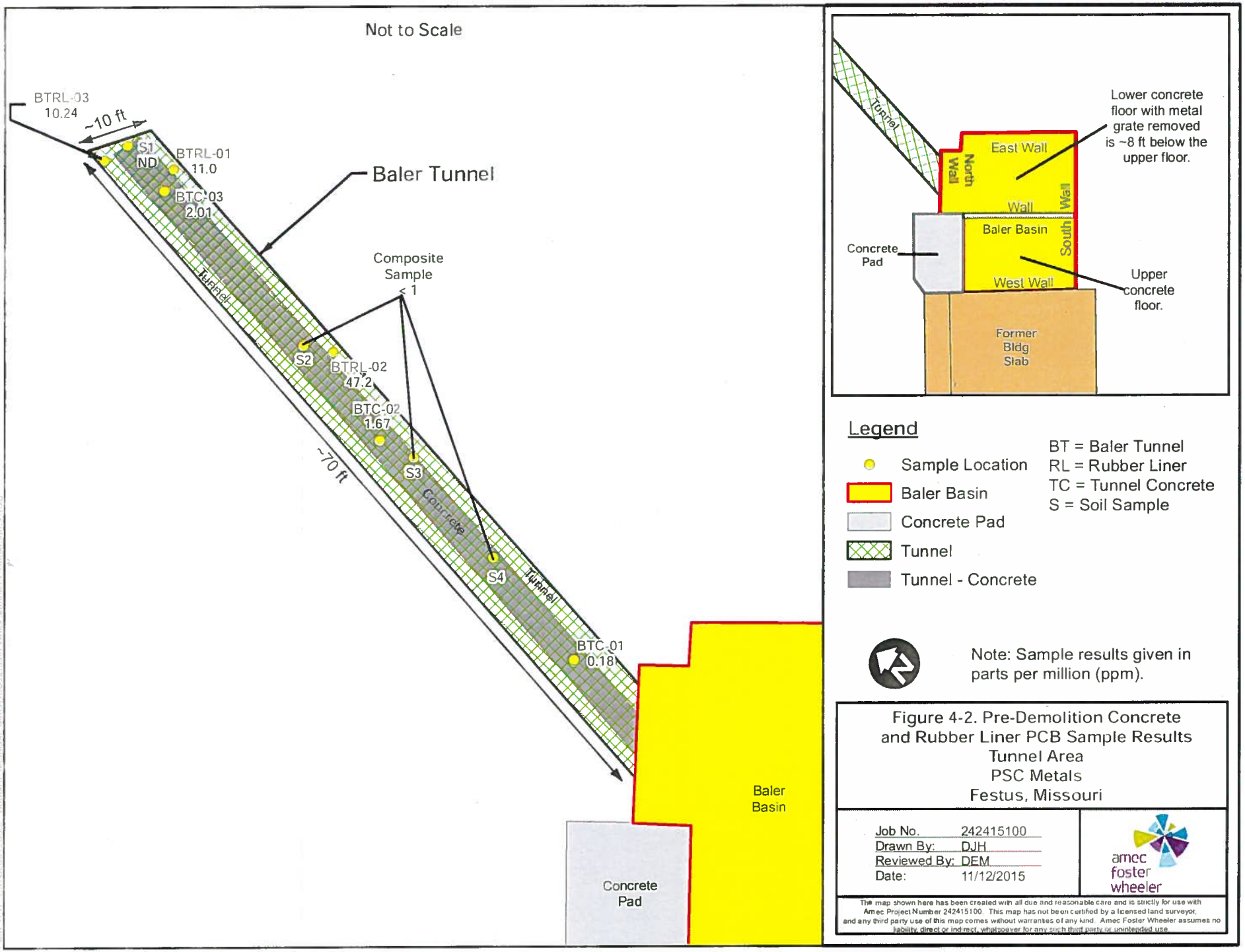

Figure 4-2. Pre-Demolition Concrete and Rubber Liner PCB Sample Results
Tunnel Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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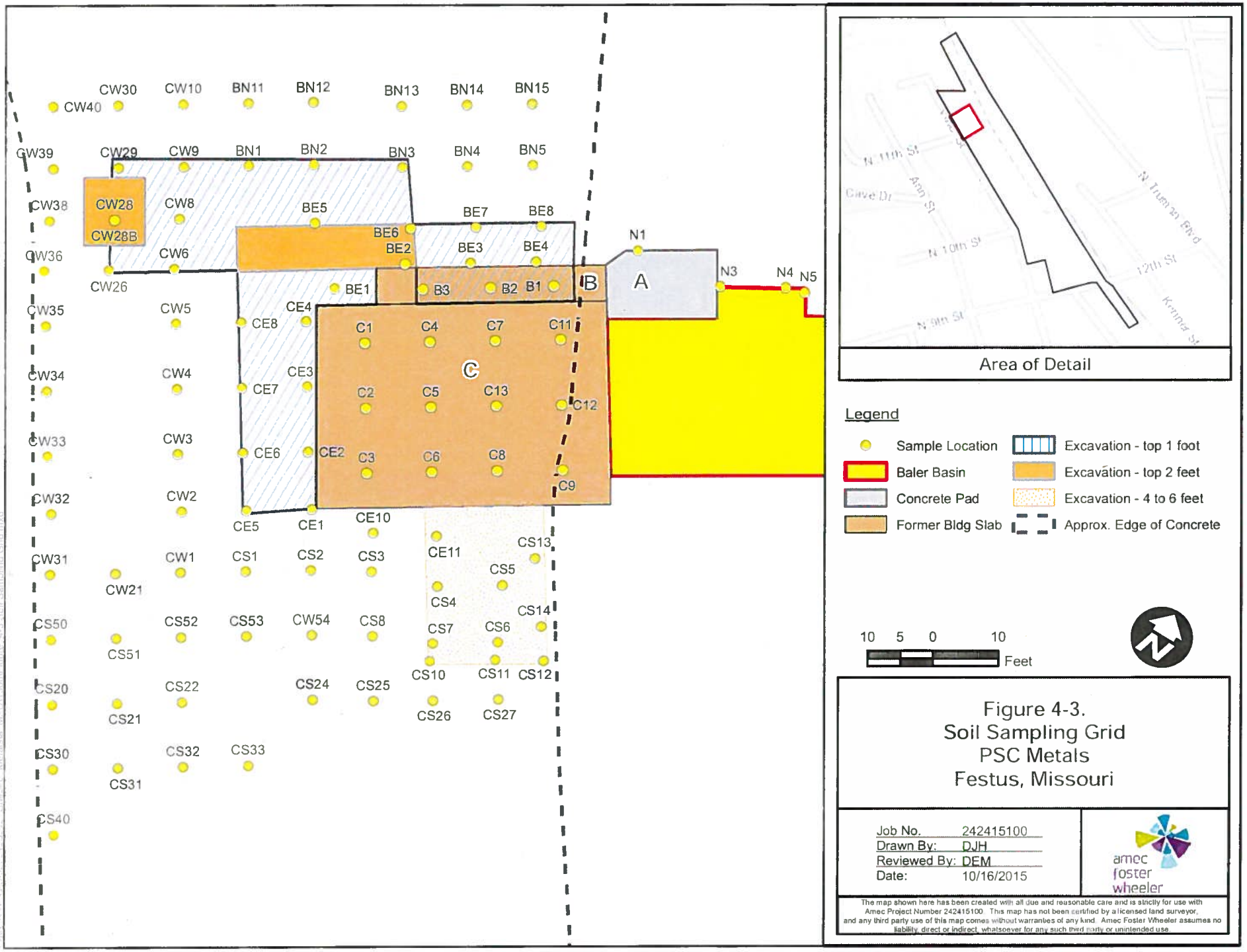

Figure 4-3.
Soil Sampling Grid
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	10/16/2015

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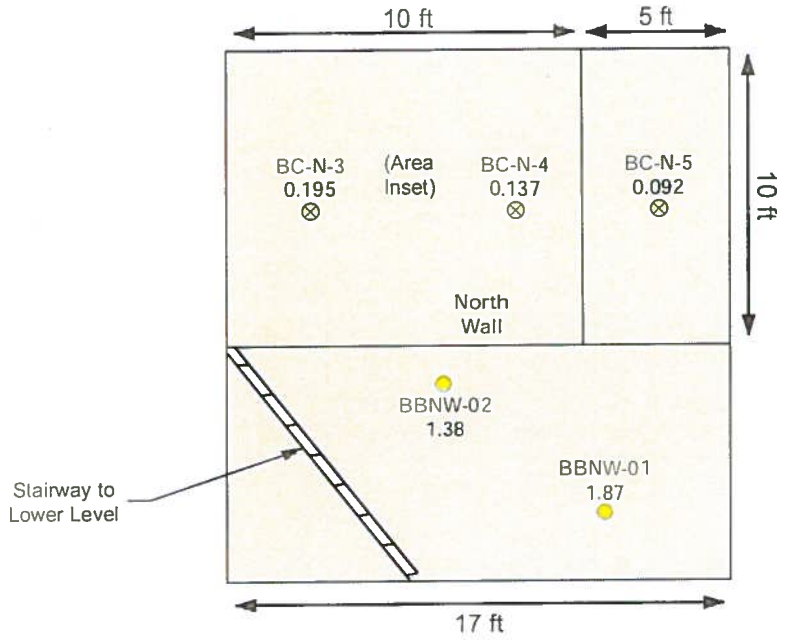
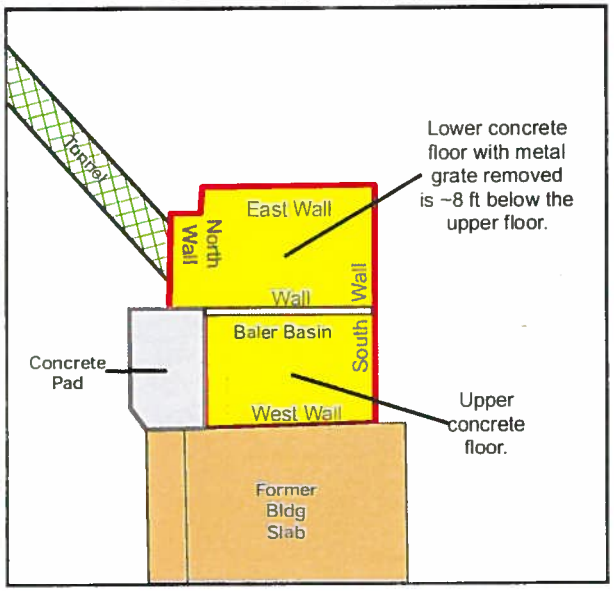
Not to Scale





Legend

- Sample Location
- Previous Sample
- North Wall

BB = Baler Basin
SW = North Wall
BC = Baler Concrete

Note: Sample results given in parts per million (ppm).

Figure 4-4. Pre-Demolition Concrete
PCB Sample Results
Baler Basin North Wall Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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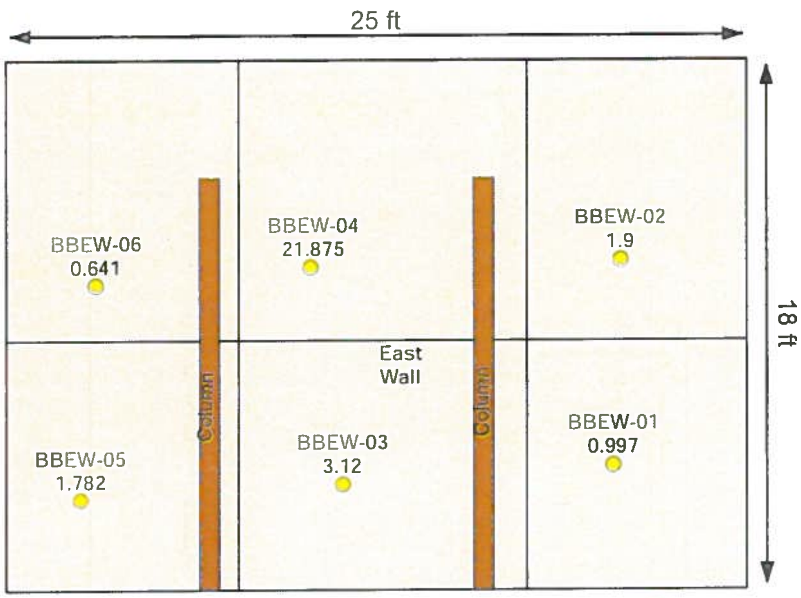

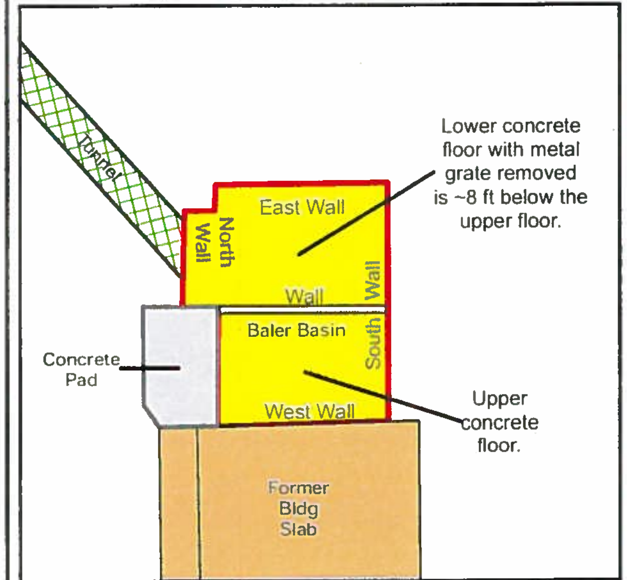

Legend

- Sample Location
- East Wall
- Column

BB = Baler Basin
EW = East Wall

Note: Sample results given in parts per million (ppm).

Figure 4-5. Pre-Demolition Concrete PCB Sample Results
Baler Basin East Wall Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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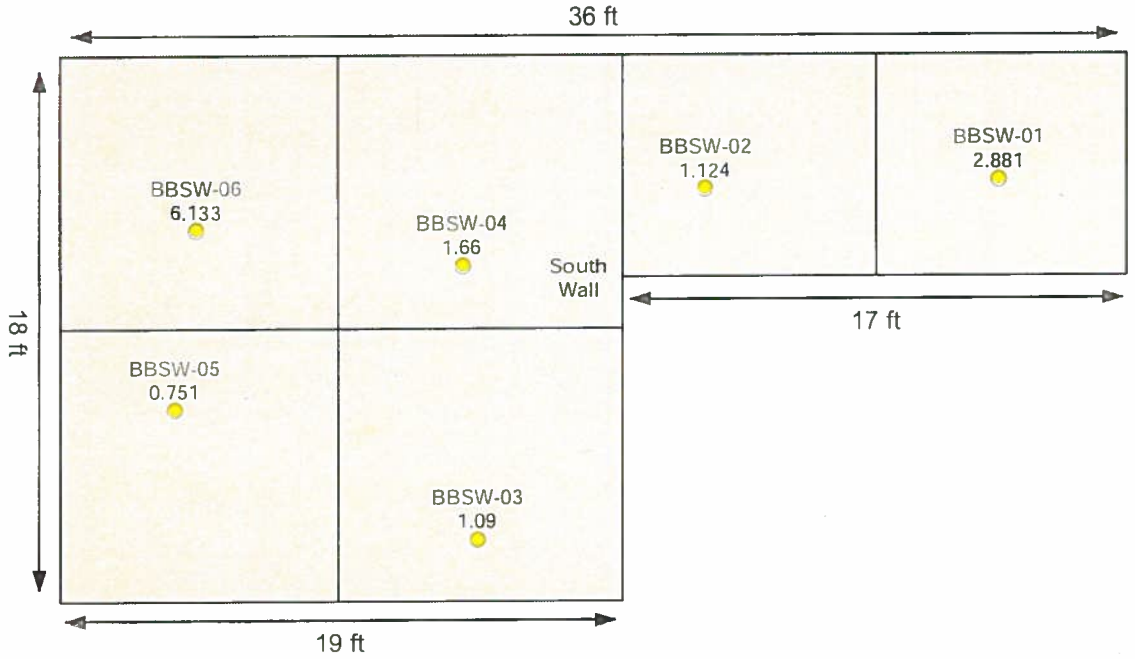
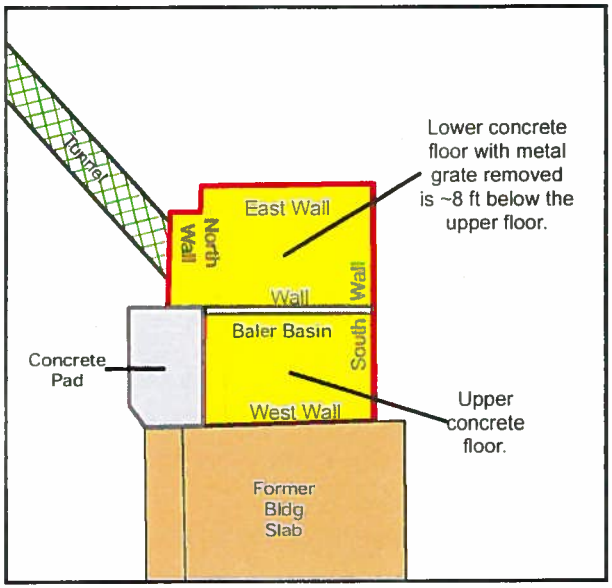
Not to Scale





Legend

Sample Location

South Wall

BB = Baler Basin
SW = South Wall

Note: Sample results given in parts per million (ppm).

Figure 4-6. Pre-Demolition Concrete
PCB Sample Results
Baler Basin South Wall Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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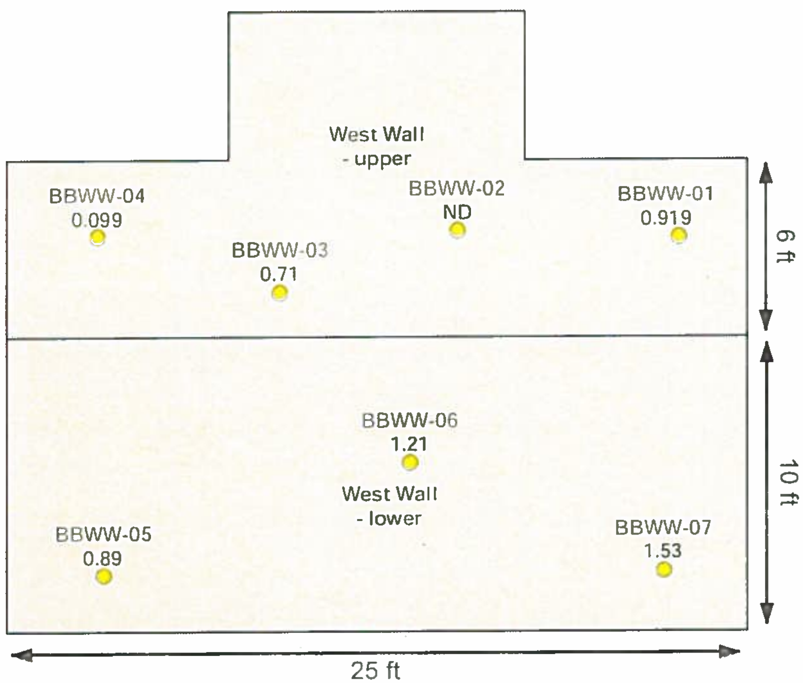
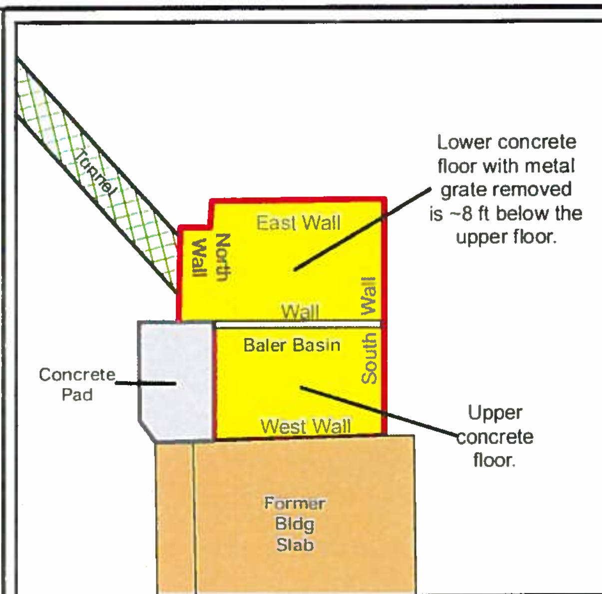
Not to Scale





Legend

- Sample Location
- West Wall

BB = Baler Basin
WW = West Wall
ND = < 1.85

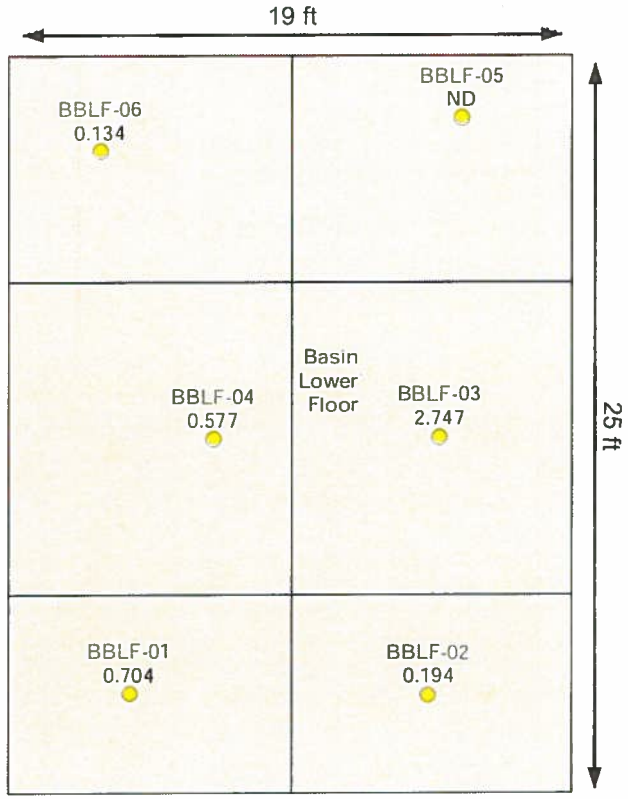
Note: Sample results given in parts per million (ppm).

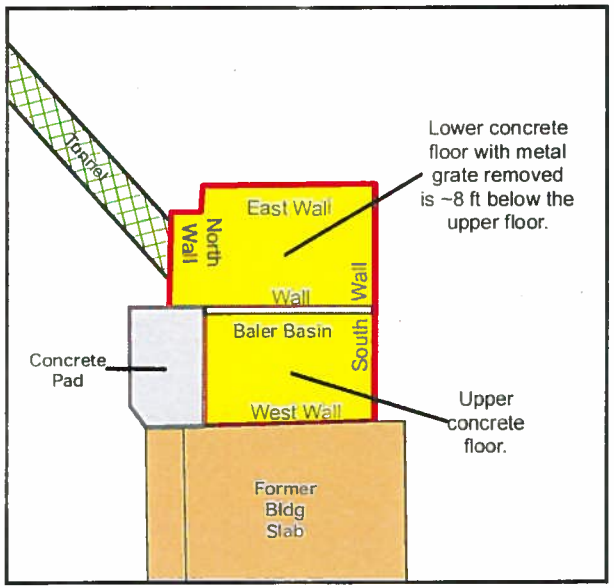
Figure 4-7. Pre-Demolition Concrete PCB Sample Results
Baler Basin West Wall Area
PSC Metals
Festus, Missouri

Job No. 242415100
Drawn By: DJH
Reviewed By: DEM
Date: 11/12/2015

amec foster wheeler

Not to Scale





Legend

- Sample Location
- Basin Lower Floor

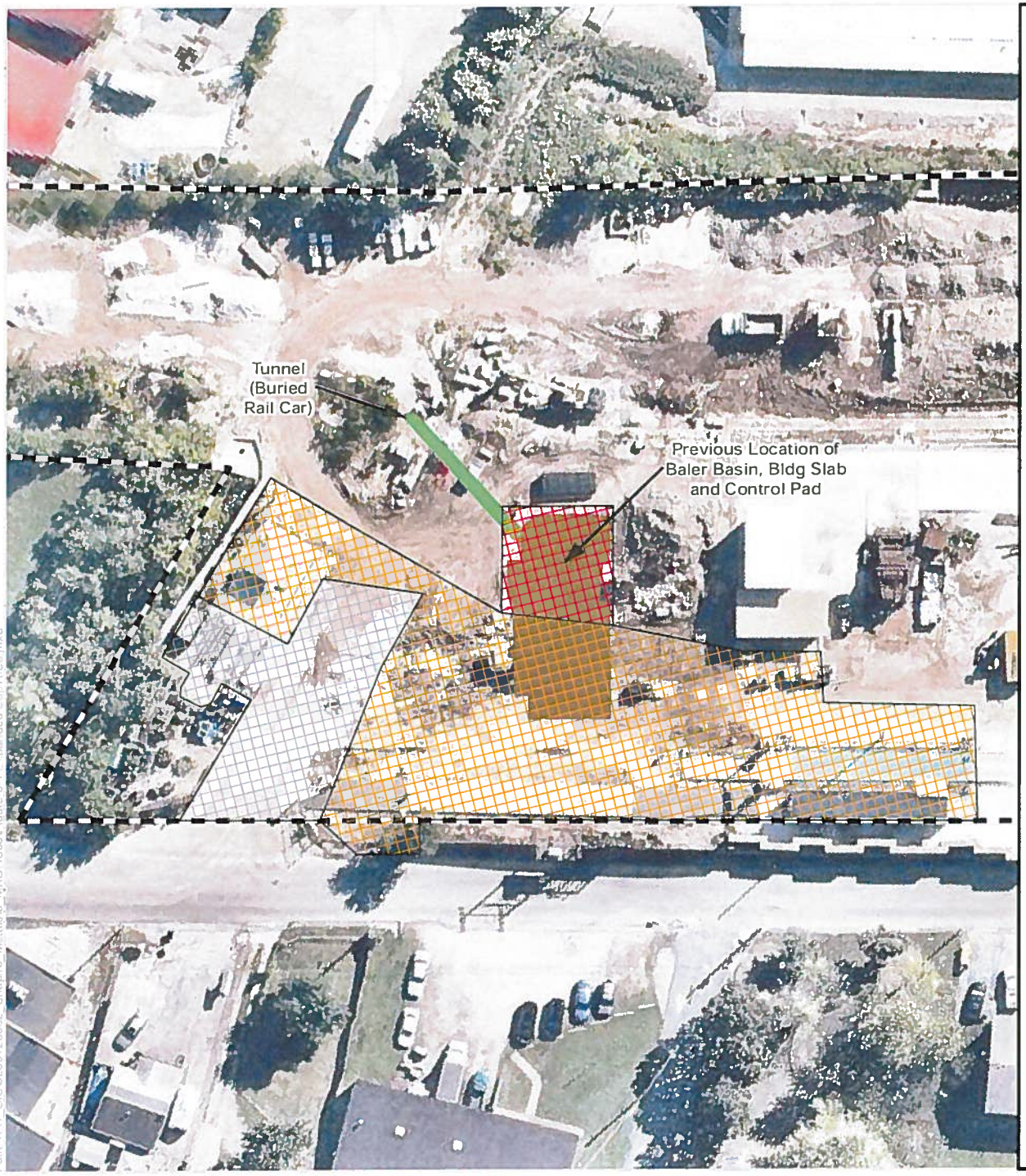
BB = Baler Basin
LF = Lower Floor
ND = < 0.116

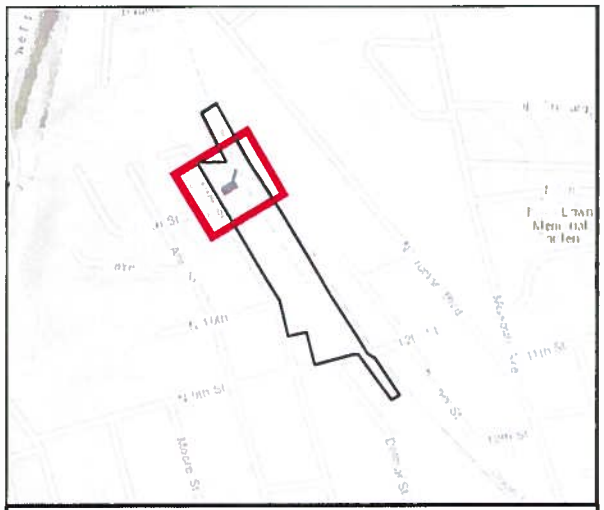
Note: Sample results given in parts per million (ppm).

Figure 4-8. Pre-Demolition Concrete
PCB Sample Results
Baler Basin Lower Floor Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

amec foster wheeler





Area of Detail

Legend

- Existing Concrete
- Expanded Concrete Cap
- New Concrete - August 2015
- PSC Metals
- Former Baler Area
- Fill/Grade Former Tunnel

50 25 0 50 Feet
(Approx. scale)

Figure 5-1
Expanded Cap Area
PSC Metals
Festus, Missouri

Job No.	242415100
Drawn By:	DJH
Reviewed By:	DEM
Date:	11/12/2015

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Tables

Table 4-1
Concrete Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Location	Comments
BC-A-1	mg/Kg-dry	2.30		< 0.373		< 0.373		1.76		< 0.373		< 0.373		< 0.373		4.06	baler pad	
BC-A-2	mg/Kg-dry	< 0.375		< 0.375		< 0.375		2.81		< 0.375		< 0.375		< 0.375		2.81	baler pad	
BC-B-1	mg/Kg-dry	59.7		< 3.75		< 3.75		< 3.75		< 3.75		< 3.75		< 3.75		59.7	baler pad	Removed to TSCA Landfill
BC-B-2	mg/Kg-dry	1,250		< 37.3		< 37.3		< 37.3		< 37.3		< 37.3		< 37.3		1,250	baler pad	" "
BC-B-3	mg/Kg-dry	98.3		< 3.75		< 3.75		< 3.75		< 3.75		< 3.75		< 3.75		98.3	baler pad	" "
BC-C-1	mg/Kg-dry	0.509		< 0.0373		< 0.0373		< 0.0373		< 0.0373		< 0.0373		< 0.0373		0.509	baler pad	
BC-C-2	mg/Kg-dry	2.22		< 0.275		< 0.275		< 0.275		< 0.275		< 0.275		< 0.275		2.22	baler pad	
BC-C-3	mg/Kg-dry	4.25		< 0.186		< 0.186		< 0.186		< 0.186		< 0.186		< 0.186		4.25	baler pad	
BC-C-4	mg/Kg-dry	51.9		< 2.82		< 2.82		< 2.82		< 2.82		< 2.82		< 2.82		51.9	baler pad	Removed to TSCA Landfill
BC-C-5	mg/Kg-dry	16.0		< 5.6		< 5.6		< 5.6		< 5.6		< 5.6		< 5.6		16.0	baler pad	" "
BC-C-6	mg/Kg-dry	15.8		< 0.558		< 0.558		< 0.558		< 0.558		< 0.558		< 0.558		15.8	baler pad	" "
BC-C-7	mg/Kg-dry	219		< 5.6		< 5.6		< 5.6		< 5.6		< 5.6		< 5.6		219	baler pad	" "
BC-C-8	mg/Kg-dry	0.519		< 0.0374		< 0.0374		< 0.0374		< 0.0374		< 0.0374		< 0.0374		0.519	baler pad	
BC-C-9	mg/Kg-dry	16.1		< 0.282		< 0.282		< 0.282		< 0.282		< 0.282		< 0.282		16.1	baler pad	Removed to TSCA Landfill
BC-C-10	mg/Kg-dry	3.86		< 0.0551		< 0.0551		< 0.0551		< 0.0551		< 0.0551		< 0.0551		3.86	baler pad	
BC-C-11	mg/Kg-dry	855		< 14.0		< 14.0		< 14.0		< 14.0		< 14.0		< 14.0		855	baler pad	Removed to TSCA Landfill
BC-C-12	mg/Kg-dry	33.6		< 0.550		< 0.550		< 0.550		< 0.550		< 0.550		< 0.550		33.6	baler pad	" "
BC-CS-1	mg/Kg-dry	< 0.0374		< 0.0374		< 0.0374		< 0.0374		< 0.0374		< 0.0374		< 0.0374		ND	slab riser	
BC-D-1	mg/Kg-dry	0.438		< 0.0375		< 0.0375		< 0.0375		< 0.0375		< 0.0375		< 0.0375		0.438	dup	
BC-D-2	mg/Kg-dry	< 0.374		< 0.374		< 0.374		2.16		< 0.374		< 0.374		< 0.374		2.16	dup	
BC-D-3	mg/Kg-dry	3.67		< 0.373		< 0.373		< 0.373		< 0.373		< 0.373		0.784		4.45	dup	
BC-F-1	mg/Kg-dry	6.00		< 0.374		< 0.374		< 0.374		< 0.374		< 0.374		0.571		6.57	basin top	
BC-F-2	mg/Kg-dry	< 0.372		< 0.372		< 0.372		1.94		< 0.372		< 0.372		0.517		2.46	basin top	
BC-F-3	mg/Kg-dry	< 0.372		< 0.372		< 0.372		1.70		< 0.372		< 0.372		0.628		2.33	basin top	
BC-F-4	mg/Kg-dry	< 0.373		< 0.373		< 0.373		0.992		< 0.373		< 0.373		0.492		1.48	basin top	
BC-F-5	mg/Kg-dry	< 0.375		< 0.375		< 0.375		0.916		< 0.375		< 0.375		0.18	J	1.10	basin top	
BC-N-1	mg/Kg-dry	0.128		< 0.0371		< 0.0371		< 0.0371		< 0.0371		< 0.0371		< 0.0371		0.128	basin wall	
BC-N-2	mg/Kg-dry	0.058		< 0.0372		< 0.0372		< 0.0372		< 0.0372		< 0.0372		< 0.0372		0.058	basin wall	
BC-N-3	mg/Kg-dry	0.165		< 0.0375		< 0.0375		< 0.0375		< 0.0375		< 0.0375		0.03	J	0.195	basin wall	
BC-N-4	mg/Kg-dry	< 0.0375		< 0.0375		< 0.0375		0.137		< 0.0375		< 0.0375		< 0.0375		0.137	basin wall	
BC-N-5	mg/Kg-dry	< 0.0372		< 0.0372		< 0.0372		0.0668		< 0.0372		< 0.0372		0.025	J	0.092	basin wall	
BC-P-1	mg/Kg-dry	< 0.0558		< 0.0558		< 0.0558		< 0.0558		< 0.0558		< 0.0558		< 0.0558		ND	baler pad	
BC-P-2	mg/Kg-dry	< 0.0376		< 0.0376		< 0.0376		0.102		< 0.0376		< 0.0376		< 0.0376		0.102	baler pad	
BC-P-3	mg/Kg-dry	0.169		< 0.0554		< 0.0554		< 0.0554		< 0.0554		< 0.0554		< 0.0554		0.169	baler pad	
BC-P-4	mg/Kg-dry	< 0.0376		< 0.0376		< 0.0376		0.0715		< 0.0376		< 0.0376		< 0.0376		0.072	baler pad	
BC-P-5	mg/Kg-dry	< 0.0376		< 0.0376		< 0.0376		0.0954		< 0.0376		< 0.0376		< 0.0376		0.095	baler pad	
BC-P-6	mg/Kg-dry	0.495		< 0.0373		< 0.0373		< 0.0373		< 0.0373		< 0.0373		< 0.0373		0.495	baler pad	
BC-P-7	mg/Kg-dry	0.364		< 0.0557		< 0.0557		< 0.0557		< 0.0557		< 0.0557		< 0.0557		0.364	baler pad	
BC-P-8	mg/Kg-dry	1.78		< 0.375		< 0.375		< 0.375		< 0.375		< 0.375		< 0.375		1.78	baler pad	
BC-P-9	mg/Kg-dry	3.99		< 0.374		< 0.374		< 0.374		< 0.374		< 0.374		< 0.374		3.99	baler pad	
BBEW-01	mg/Kg-dry	< 0.573		< 0.573		< 0.573		0.787		< 0.573		0.210	J	< 0.573		1.00	basin wall	
BBEW-02	mg/Kg-dry	< 0.586		< 0.586		< 0.586		1.68		< 0.586		0.220	J	< 0.586		1.90	basin wall	
BBEW-03	mg/Kg-dry	2.62		< 0.579		< 0.579		< 0.579		< 0.579		0.500	J	< 0.579		3.12	basin wall	

Table 4-1
Concrete Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Location	Comments
BBEW-04	mg/Kg-dry	< 0.576		< 0.576		< 0.576		**18.2**		< 0.576		**3.01**		**0.665**		**21.9**	basin wall	Will be capped in place
BBEW-05	mg/Kg-dry	**1.51**		< 0.109		< 0.109		< 0.109		< 0.109		**0.272**		< 0.109		**1.78**	basin wall	
BBEW-06	mg/Kg-dry	< 0.116		< 0.116		< 0.116		**0.551**		< 0.116		**0.09**	J	< 0.116		**0.641**	basin wall	
BBEW-022	mg/Kg-dry	< 0.576		< 0.576		< 0.576		**1.80**		< 0.576		**0.260**	J	< 0.576		**2.06**	basin wall	
BBLF-01	mg/Kg-dry	< 0.115		< 0.115		< 0.115		**0.502**		< 0.115		**0.132**		**0.070**	J	**0.704**	sub-floor	
BBLF-02	mg/Kg-dry	0.194		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		**0.194**	sub-floor	
BBLF-03	mg/Kg-dry	2.22		< 0.116		< 0.116		< 0.116		< 0.116		**0.380**		**0.147**		**2.75**	sub-floor	
BBLF-04	mg/Kg-dry	0.388		< 0.117		< 0.117		< 0.117		< 0.117		**0.122**		**0.067**	J	**0.577**	sub-floor	
BBLF-05	mg/Kg-dry	< 0.116		< 0.116		< 0.116		< 0.116		< 0.116		< 0.116		< 0.116		ND	sub-floor	
BBLF-06	mg/Kg-dry	**0.134**		< 0.119		< 0.119		< 0.119		< 0.119		< 0.119		< 0.119		ND	sub-floor	
BBLF-044	mg/Kg-dry	**0.446**		< 0.117		< 0.117		< 0.117		< 0.117		**0.140**		**0.085**	J	**0.671**	sub-floor	
BBLF-066	mg/Kg-dry	< 0.117		< 0.117		< 0.117		**0.538**		< 0.117		**0.136**		< 0.117		**0.674**	sub-floor	
BBNW-01	mg/Kg-dry	**1.87**		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		**1.87**	basin wall	
BBNW-02	mg/Kg-dry	**1.38**		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		< 0.114		**1.38**	basin wall	
BBSW-01	mg/Kg-dry	**1.32**		< 0.189		< 0.189		< 0.189		< 0.189		**1.28**		**0.281**		**2.88**	basin wall	
BBSW-02	mg/Kg-dry	**0.734**		< 0.568		< 0.568		< 0.568		< 0.568		**0.39**	J	< 0.568		**1.12**	basin wall	
BBSW-03	mg/Kg-dry	1.09		< 0.570		< 0.570		< 0.570		< 0.570		< 0.570		< 0.570		**1.09**	basin wall	
BBSW-04	mg/Kg-dry	1.20		< 0.584		< 0.584		< 0.584		< 0.584		**0.46**	J	< 0.584		**1.66**	basin wall	
BBSW-05	mg/Kg-dry	**0.751**		< 0.557		< 0.557		< 0.557		< 0.557		< 0.557		< 0.557		**0.751**	basin wall	
BBSW-06	mg/Kg-dry	< 0.557		< 0.557		< 0.557		**5.40**		< 0.557		**0.733**		< 0.557		**6.13**	basin wall	
BBSW-011	mg/Kg-dry	**1.11**		< 0.188		< 0.188		< 0.188		< 0.188		**0.915**		**0.217**		**2.24**	basin wall	
BBSW-033	mg/Kg-dry	**1.46**		< 0.568		< 0.568		< 0.568		< 0.568		**0.21**	J	< 0.568		**1.67**	basin wall	
BBWW-01	mg/Kg-dry	**0.919**		< 0.189		< 0.189		< 0.189		< 0.189		< 0.189		< 0.189		**0.919**	basin wall	
BBWW-02	mg/Kg-dry	< 1.850		< 1.850		< 1.850		< 1.850		< 1.850		< 1.850		< 1.850		ND	basin wall	
BBWW-03	mg/Kg-dry	**0.503**		< 0.187		< 0.187		< 0.187		< 0.187		**0.207**		< 0.187		**0.710**	basin wall	
BBWW-04	mg/Kg-dry	**0.099**	J	< 0.186		< 0.186		< 0.186		< 0.186		< 0.186		< 0.186		**0.099**	basin wall	
BBWW-05	mg/Kg-dry	**0.890**	J	< 1.160		< 1.160		< 1.160		< 1.160		< 1.160		< 1.160		**0.890**	basin wall	
BBWW-06	mg/Kg-dry	< 0.579		< 0.579		< 0.579		**1.00**		< 0.579		**0.21**	J	< 0.579		**1.21**	basin wall	
BBWW-07	mg/Kg-dry	1.53		< 0.563		< 0.563		< 0.563		< 0.563		< 0.563		< 0.563		**1.53**	basin wall	
BCP-01	mg/Kg-dry	1.48		< 0.192		< 0.192		< 0.192		< 0.192		**0.575**		**0.315**		**2.37**	sump cover	
BCP-02	mg/Kg-dry	0.926		< 0.220		< 0.220		< 0.220		< 0.220		**0.295**		**0.22**	J	**1.44**	sump cover	
BTC-01	mg/Kg-dry	**0.180**	J	< 0.220		< 0.220		< 0.220		< 0.220		< 0.220		< 0.220		**0.180**	tunnel floor	
BTC-02	mg/Kg-dry	**1.67**		< 0.196		< 0.196		< 0.196		< 0.196		< 0.196		< 0.196		**1.67**	tunnel floor	
BTC-03	mg/Kg-dry	**2.01**		< 0.201		< 0.201		< 0.201		< 0.201		< 0.201		< 0.201		**2.01**	tunnel floor	
BTRL01	mg/Kg-dry	**11.0**		< 2.650		< 2.650		< 2.650		< 2.650		< 2.650		< 2.650		**11.0**	tunnel liner	Will be moved to basin and capped
BTRL02	mg/Kg-dry	**47.4**		< 3.350		< 3.350		< 3.350		< 3.350		< 3.350		< 3.350		**47.4**	tunnel liner	" "
BTRL-03	mg/Kg-dry	< 3.150		< 3.150		< 3.150		< 3.150		**8.14**		**2.10**	J	< 3.150		**10.2**	tunnel liner	" "

Notes:

mg/Kg-dry - milligrams per kilogram, dry weight basis
< - parameter not detected above the specified value
Blue Shading indicates concentration exceeds cleanup level of 9.4 mg/Kg total PCBs

J - estimated value
Bold - indicates a detection
Stat - data qualifier
Dup = duplicate sample

Table 4-2
Soil Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Depth (inches)	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Comments
B1	0-6	mg/Kg-dry	0.731		< 0.411		< 0.411		< 0.411		< 0.411		0.534		0.23	J	1.50	
B1	12-18	mg/Kg-dry	< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		ND	
B2	0-6	mg/Kg-dry	< 0.0419		< 0.0419		< 0.0419		< 0.0419		0.868		0.932		0.914		2.71	
B2	12-18	mg/Kg-dry	< 0.0407		< 0.0407		< 0.0407		< 0.0407		< 0.0407		< 0.0407		< 0.0407		ND	
B3	0-6	mg/Kg-dry	< 0.395		< 0.395		< 0.395		< 0.395		< 0.395		< 0.395		< 0.395		ND	
B10	12-18	mg/Kg-dry	< 0.0425		< 0.0425		< 0.0425		< 0.0425		< 0.0425		0.024	J	< 0.0425		0.02	
BE1	0-1	mg/Kg-dry	30.8		< 2.12		< 2.12		< 2.12		< 2.12		< 2.12		< 2.12		30.8	Excavated and disposed at TSCA LF
BE1	12-18	mg/Kg-dry	< 0.387		< 0.387		< 0.387		< 0.387		< 0.387		1.08		< 0.387		1.08	
BE2	0-1	mg/Kg-dry	83.8		< 4.19		< 4.19		< 4.19		< 4.19		< 4.19		< 4.19		83.8	Excavated and disposed at TSCA LF
BE2	12-18	mg/Kg-dry	0.322		< 0.0393		< 0.0393		< 0.0393		< 0.0393		0.269		0.118		0.71	
BE3	0-2	mg/Kg-dry	34.3		< 4.29		< 4.29		< 4.29		< 4.29		< 4.29		< 4.29		34.3	Excavated and disposed at TSCA LF
BE3	12-18	mg/Kg-dry	0.025	J	< 0.0401		< 0.0401		< 0.0401		< 0.0401		< 0.0401		< 0.0401		0.03	
BE4	0-2	mg/Kg-dry	17.1		< 1.02		< 1.02		< 1.02		< 1.02		< 1.02		< 1.02		17.1	Excavated and disposed at TSCA LF
BE4	12-18	mg/Kg-dry	0.018	J	< 0.0406		< 0.0406		< 0.0406		< 0.0406		< 0.0406		< 0.0406		0.02	
BE5	0-6	mg/Kg-dry	25.2		< 1.85		< 1.85		< 1.85		< 1.85		< 1.85		< 1.85		25.2	Excavated and disposed at TSCA LF
BE5	12-18	mg/Kg-dry	4.98		< 0.388		< 0.388		< 0.388		< 0.388		4.29		1.05		10.3	Covered with new concrete in 2015
BE5	24-30	mg/Kg-dry	0.156		< 0.0436		< 0.0436		< 0.0436		< 0.0436		< 0.0436		< 0.0436		0.16	
BE6	0-6	mg/Kg-dry	10.3		< 0.975		< 0.975		< 0.975		< 0.975		< 0.975		< 0.975		10.30	Excavated and disposed at TSCA LF
BE6	12-18	mg/Kg-dry	< 0.393		< 0.393		< 0.393		< 0.393		< 0.393		0.641		0.31	J	0.95	
BE7	0-6	mg/Kg-dry	10.4		< 1		< 1		< 1		< 1		< 1		< 1		10.4	Excavated and disposed at TSCA LF
BE7	12-18	mg/Kg-dry	< 0.389		< 0.389		< 0.389		< 0.389		1.14		1.23		0.506		2.88	
BE8	0-6	mg/Kg-dry	4.56		< 0.419		< 0.419		< 0.419		< 0.419		0.436		< 0.419		5.00	
BE8	12-18	mg/Kg-dry	< 0.0392		< 0.0392		< 0.0392		< 0.0392		< 0.0392		0.795		0.398		1.19	
BE23	12-18	mg/Kg-dry	0.019	J	< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		0.02	Dup of BE3 (12-18)
BN1	0-6	mg/Kg-dry	1.44		< 0.222		< 0.222		< 0.222		< 0.222		0.2	J	< 0.222		1.64	
BN2	0-6	mg/Kg-dry	1.56		< 0.21		< 0.21		< 0.21		< 0.21		0.16	J	< 0.21		1.72	
BN3	0-6	mg/Kg-dry	1.08		< 0.207		< 0.207		< 0.207		< 0.207		0.15	J	< 0.207		1.23	
BN4	0-6	mg/Kg-dry	6.45		< 1.11		< 1.11		< 1.11		< 1.11		0.64	J	< 1.11		7.09	
BN5	0-6	mg/Kg-dry	2.44		< 0.207		< 0.207		< 0.207		< 0.207		0.365		0.14	J	2.95	
BN11	0-6	mg/Kg-dry	< 0.0396		< 0.0396		< 0.0396		< 0.0396		0.432		0.136		0.0542		0.62	
BN12	0-6	mg/Kg-dry	< 0.0385		< 0.0385		< 0.0385		1.08		0.193		< 0.0385		0.0761		1.35	
BN13	0-6	mg/Kg-dry	< 0.0392		< 0.0392		< 0.0392		< 0.0392		0.275		0.0947		0.0546		0.42	
BN14	0-6	mg/Kg-dry	< 0.0392		< 0.0392		< 0.0392		< 0.0392		0.796		0.296		0.149		1.24	
BN15	0-6	mg/Kg-dry	< 0.0405		< 0.0405		< 0.0405		< 0.0405		0.317		0.117		0.0864		0.52	
BN111	0-6	mg/Kg-dry	< 0.0389		< 0.0389		< 0.0389		< 0.0389		0.256		0.0872		0.0394		0.38	Dup of BN11
BN112	0-6	mg/Kg-dry	< 0.0389		< 0.0389		< 0.0389		1.54		< 0.0389		0.195		0.0778		1.81	Dup of BN12
C1	0-6	mg/Kg-dry	0.127		< 0.0386		< 0.0386		< 0.0386		< 0.0386		< 0.0386		< 0.0386		0.13	
C2	0-6	mg/Kg-dry	0.119		< 0.0403		< 0.0403		< 0.0403		< 0.0403		0.0435		< 0.0403		0.16	
C3	0-5	mg/Kg-dry	< 0.0414		< 0.0414		< 0.0414		< 0.0414		< 0.0414		< 0.0414		< 0.0414		ND	
C4	0-6	mg/Kg-dry	0.426		< 0.0387		< 0.0387		< 0.0387		< 0.0387		< 0.0387		< 0.0387		0.43	
C5	0-6	mg/Kg-dry	0.105		< 0.0403		< 0.0403		< 0.0403		< 0.0403		< 0.0403		< 0.0403		0.11	
C6	0-5	mg/Kg-dry	0.234		< 0.0396		< 0.0396		< 0.0396		< 0.0396		< 0.0396		< 0.0396		0.23	

Table 4-2
Soil Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Depth (inches)	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Comments
C7	0-6	mg/Kg-dry	< 0.041		< 0.041		< 0.041		< 0.041		< 0.041		< 0.041		< 0.041		ND	
C8	0-5	mg/Kg-dry	**0.0789**		< 0.0427		< 0.0427		< 0.0427		< 0.0427		< 0.0427		< 0.0427		**0.08**	
C9	5-10	mg/Kg-dry	< 0.0456		< 0.0456		< 0.0456		< 0.0456		< 0.0456		< 0.0456		< 0.0456		ND	
C11	0-6	mg/Kg-dry	**0.42**		< 0.0394		< 0.0394		< 0.0394		< 0.0394		< 0.0394		< 0.0394		**0.42**	
C12	0-6	mg/Kg-dry	< 0.0412		< 0.0412		< 0.0412		< 0.0412		< 0.0412		< 0.0412		< 0.0412		ND	
C13	0-6	mg/Kg-dry	**0.025**	J	< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		< 0.0402		**0.03**	
C22	DUP	mg/Kg-dry	**0.575**		< 0.0383		< 0.0383		< 0.0383		< 0.0383		**0.0484**		< 0.0383		**0.62**	
CE1	0-5	mg/Kg-dry	**0.913**		< 0.0431		< 0.0431		< 0.0431		< 0.0431		**0.205**		< 0.0431		**1.12**	
CE1	12-18	mg/Kg-dry	< 0.0391		< 0.0391		< 0.0391		< 0.0391		< 0.0391		< 0.0391		**0.185**		**0.19**	
CE2	0-5	mg/Kg-dry	**8.5**		< 0.437		< 0.437		< 0.437		< 0.437		< 0.437		< 0.437		**8.50**	
CE2	12-18	mg/Kg-dry	< 0.0413		< 0.0413		< 0.0413		< 0.0413		< 0.0413		< 0.0413		**0.24**		**0.24**	
CE3	0-3	mg/Kg-dry	**17.8**		< 1.16		< 1.16		< 1.16		< 1.16		< 1.16		< 1.16		**17.8**	Excavated and disposed at TSCA LF
CE3	12-18	mg/Kg-dry	0.111		< 0.042		< 0.042		< 0.042		< 0.042		**0.141**		**0.245**		**0.39**	
CE4	0-3	mg/Kg-dry	**7.96**		< 1.13		< 1.13		< 1.13		< 1.13		< 1.13		< 1.13		**7.96**	
CE4	12-18	mg/Kg-dry	< 0.0403		< 0.0403		< 0.0403		< 0.0403		< 0.0403		< 0.0403		< 0.0403		ND	
CE5	0-2	mg/Kg-dry	**0.521**		< 0.0396		< 0.0396		< 0.0396		< 0.0396		< 0.0396		**0.033**	J	**0.55**	
CE5	12-18	mg/Kg-dry	< 0.0397		< 0.0397		< 0.0397		< 0.0397		**0.434**		**0.298**		< 0.0397		**0.73**	
CE6	0-1	mg/Kg-dry	**2.14**		< 0.186		< 0.186		< 0.186		< 0.186		**0.17**	J	< 0.186		**2.31**	
CE6	12-18	mg/Kg-dry	< 0.0402		< 0.0402		< 0.0402		< 0.0402		**0.339**		**0.148**		< 0.0402		**0.49**	
CE7	0-1	mg/Kg-dry	**1.78**		< 0.192		< 0.192		< 0.192		< 0.192		**0.13**	J	< 0.192		**1.91**	
CE7	12-18	mg/Kg-dry	**5.59**		< 0.799		< 0.799		< 0.799		< 0.799		< 0.799		< 0.799		**5.59**	
CE8	0-1	mg/Kg-dry	**1.35**		< 0.0783		< 0.0783		< 0.0783		< 0.0783		< 0.0783		< 0.0783		**1.35**	
CE8	12-18	mg/Kg-dry	**1.11**		< 0.198		< 0.198		< 0.198		< 0.198		**0.241**		**0.078**	J	**1.43**	
CE9	0-1	mg/Kg-dry	**1.5**		< 0.189		< 0.189		< 0.189		< 0.189		**0.12**	J	< 0.189		**1.62**	Dup of CE6 (0-1)
CE10	0-5	mg/Kg-dry	**0.524**		< 0.0416		< 0.0416		< 0.0416		< 0.0416		**0.166**		< 0.0416		**0.69**	
CE11	0-6	mg/Kg-dry	< 0.0441		< 0.0441		< 0.0441		**1.31**		< 0.0441		**0.264**		< 0.0441		**1.57**	
CE11	12-18	mg/Kg-dry	**0.204**		< 0.0409		< 0.0409		< 0.0409		< 0.0409		**0.113**		**0.0614**		**0.38**	
CS1	0-6	mg/Kg-dry	< 0.0388		< 0.0388		< 0.0388		**0.275**		< 0.0388		**0.0601**		< 0.0388		**0.34**	
CS1	10-12	mg/Kg-dry	**0.0528**		< 0.0376		< 0.0376		< 0.0376		< 0.0376		**0.02**	J	< 0.0376		**0.07**	
CS2	0-6	mg/Kg-dry	< 0.0389		< 0.0389		< 0.0389		**1.26**		< 0.0389		**0.294**		**0.141**		**1.70**	
CS2	12-14	mg/Kg-dry	**1.17**		< 0.0408		< 0.0408		< 0.0408		< 0.0408		**0.278**		**0.119**		**1.57**	
CS3	0-6	mg/Kg-dry	< 0.042		< 0.042		< 0.042		**0.818**		< 0.042		**0.227**		**0.121**		**1.17**	
CS3	12-18	mg/Kg-dry	**0.417**		< 0.0406		< 0.0406		< 0.0406		< 0.0406		**0.154**		**0.0898**		**0.66**	
CS4	0-6	mg/Kg-dry	< 0.042		< 0.042		< 0.042		**1.27**		< 0.042		**0.318**		**0.18**		**1.77**	
CS4	12-18	mg/Kg-dry	**98.2**		< 4.11		< 4.11		< 4.11		< 4.11		< 4.11		< 4.11		**98.2**	Excavated and disposed at TSCA LF
CS4	24-30	mg/Kg-dry	< 0.209		< 0.209		< 0.209		< 0.209		**1.74**		**1.28**		< 0.209		**3.02**	
CS4	48-54	mg/Kg-dry	< 0.047		< 0.047		< 0.047		< 0.047		< 0.047		< 0.047		< 0.047		ND	
CS5	0-6	mg/Kg-dry	**2.33**		< 0.0436		< 0.0436		< 0.0436		< 0.0436		**0.176**		< 0.0436		**2.51**	
CS5	12-18	mg/Kg-dry	< 0.631		< 0.631		< 0.631		< 0.631		< 0.631		< 0.631		< 0.631		ND	
CS5	48-54	mg/Kg-dry	< 0.0468		< 0.0468		< 0.0468		< 0.0468		< 0.0468		< 0.0468		< 0.0468		ND	
CS6	0-6	mg/Kg-dry	< 0.0462		< 0.0462		< 0.0462		**0.239**		< 0.0462		**0.0743**		< 0.0462		**0.31**	
CS6	72-78	mg/Kg-dry	< 0.045		< 0.045		< 0.045		< 0.045		< 0.045		< 0.045		< 0.045		ND	

Table 4-2
Soil Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Depth (inches)	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Comments
CS7	0-6	mg/Kg-dry	< 0.0422		< 0.0422		< 0.0422		0.51		< 0.0422		0.147		< 0.0422		0.66	
CS7	48-54	mg/Kg-dry	< 0.0444		< 0.0444		< 0.0444		< 0.0444		< 0.0444		< 0.0444		< 0.0444		ND	
CS8	0-6	mg/Kg-dry	< 0.0402		< 0.0402		< 0.0402		0.617		< 0.0402		0.181		< 0.0402		0.80	
CS10	24-28	mg/Kg-dry	< 0.043		< 0.043		< 0.043		0.429		< 0.043		0.0868		< 0.043		0.52	
CS10	42-48	mg/Kg-dry	< 0.404		< 0.404		< 0.404		9.24		< 0.404		1.66		0.525		11.4	Excavated and disposed at TSCA LF
CS11	24-28	mg/Kg-dry	< 0.0456		< 0.0456		< 0.0456		0.832		< 0.0456		0.149		< 0.0456		0.98	
CS11	42-48	mg/Kg-dry	4.26		< 0.399		< 0.399		< 0.399		< 0.399		0.35	J	< 0.399		4.61	
CS12	24-28	mg/Kg-dry	< 0.0428		< 0.0428		< 0.0428		0.696		< 0.0428		0.139		< 0.0428		0.84	
CS12	42-46	mg/Kg-dry	< 0.189		< 0.189		< 0.189		3.95		< 0.189		0.444		0.153		4.55	
CS13	42-46	mg/Kg-dry	< 0.994		< 0.994		< 0.994		8.15		< 0.994		0.95		0.307		9.41	Excavated and disposed at TSCA LF
CS14	42-46	mg/Kg-dry	< 1.05		< 1.05		< 1.05		9.43		< 1.05		0.889		< 0.0421		10.3	Excavated and disposed at TSCA LF
CS15	42-48	mg/Kg-dry	3.9		< 0.391		< 0.391		< 0.391		< 0.391		0.32	J	0.132		4.35	Dup of CS11 (42-48)
CS20	0-6	mg/Kg-dry	< 3.98		< 3.98		< 3.98		< 3.98		< 3.98		9.49		1.4	J	10.9	Covered with new concrete in 2015
CS20	12-18	mg/Kg-dry	< 0.408	J	< 0.408		< 0.408		< 0.408		< 0.408		2.37		0.434		2.80	
CS21	0-6	mg/Kg-dry	< 0.0387		< 0.0387		< 0.0387		< 0.0387		0.748		0.683		0.227		1.66	
CS22	0-6	mg/Kg-dry	< 0.0385		< 0.0385		< 0.0385		< 0.0385		< 0.0385		< 0.0385		0.0552		0.06	
CS24	0-6	mg/Kg-dry	< 0.039		< 0.039		< 0.039		< 0.039		0.394		0.157		< 0.039		0.55	
CS25	0-6	mg/Kg-dry	< 0.0385		< 0.0385		< 0.0385		0.467		< 0.0385		0.162		0.0816		0.71	
CS26	0-6	mg/Kg-dry	< 0.041		< 0.041		< 0.041		< 0.041		0.247		0.0942		0.037	J	0.38	
CS27	0-12	mg/Kg-dry	< 0.042		< 0.042		< 0.042		< 0.042		0.312		0.149		< 0.042		0.46	
CS27	24	mg/Kg-dry	3.34		< 0.0407		< 0.0407		< 0.0407		< 0.0407		0.549		< 0.0407		3.89	
CS30	0-6	mg/Kg-dry	< 3.98		< 3.98		< 3.98		< 3.98		< 3.98		34.2		8.72		42.9	Covered with new concrete in 2015
CS30	12-18	mg/Kg-dry	< 2.24		< 2.24		< 2.24		< 2.24		< 2.24		18.9		3.6		22.5	Covered with new concrete in 2015
CS31	0-6	mg/Kg-dry	< 0.202		< 0.202		< 0.202		< 0.202		< 0.202		1.99		0.8		2.79	
CS32	0-6	mg/Kg-dry	< 0.198		< 0.198		< 0.198		< 0.198		< 0.198		1.9		0.502		2.40	
CS33	0-6	mg/Kg-dry	< 0.0411		< 0.0411		< 0.0411		< 0.0411		0.762		0.368		0.166		1.30	
CS40	0-6	mg/Kg-dry	< 0.215		< 0.215		< 0.215		< 0.215		< 0.215		1.82		0.39		2.21	
CS50	0-6	mg/Kg-dry	< 0.0425		< 0.0425		< 0.0425		< 0.0425		0.429		0.26		< 0.0425		0.69	
CS51	0-6	mg/Kg-dry	< 0.0382		< 0.0382		< 0.0382		< 0.0382		0.308		0.162		0.0639		0.53	
CS53	0-6	mg/Kg-dry	< 0.0387		< 0.0387		< 0.0387		0.409		< 0.0387		0.121		0.0683		0.60	
CW1	0-6	mg/Kg-dry	1.17		< 0.201		< 0.201		< 0.201		< 0.201		0.343		< 0.201		1.51	
CW2	0-6	mg/Kg-dry	< 0.212		< 0.212		< 0.212		0.509		< 0.212		0.16	J	< 0.212		0.67	
CW3	0-3	mg/Kg-dry	7.96		< 1.06		< 1.06		< 1.06		< 1.06		0.5	J	< 1.06		8.46	
CW4	0-6	mg/Kg-dry	4.45		< 0.201		< 0.201		< 0.201		< 0.201		0.308		< 0.201		4.76	
CW5	0-6	mg/Kg-dry	0.757		< 0.0401		< 0.0401		< 0.0401		< 0.0401		0.146		< 0.0401		0.90	
CW6	0-6	mg/Kg-dry	< 0.043		< 0.043		< 0.043		0.575		< 0.043		0.152		< 0.043		0.73	
CW7	0-6	mg/Kg-dry	< 0.0431		< 0.0431		< 0.0431		0.658		< 0.0431		0.16		< 0.0431		0.82	Dup of CW6
CW8	0-6	mg/Kg-dry	< 2.14		< 2.14		< 2.14		< 2.14		12.8		< 2.14		< 2.14		12.8	Excavated and disposed at TSCA LF
CW8	12-18	mg/Kg-dry	< 0.0377		< 0.0377		< 0.0377		0.514		< 0.0377		0.665		0.546		1.73	
CW9	0-6	mg/Kg-dry	< 0.0442		< 0.0442		< 0.0442		< 0.0442		0.155		0.0549		< 0.0442		0.21	
CW10	0-6	mg/Kg-dry	< 0.0398		< 0.0398		< 0.0398		< 0.0398		0.398		0.15		0.143		0.69	
CW21	0-6	mg/Kg-dry	< 0.0395		< 0.0395		< 0.0395		< 0.0395		0.679		0.364		0.31		1.35	
CW26	12-18	mg/Kg-dry	< 0.198		< 0.198		< 0.198		< 0.198		0.642		0.17	J	< 0.198		0.81	

Table 4-2
Soil Sample PCB Analytical Results
PSC Metals, Inc., Festus, MO

Sample ID	Depth (inches)	Units	Aroclor 1016	Stat	Aroclor 1221	Stat	Aroclor 1232	Stat	Aroclor 1242	Stat	Aroclor 1248	Stat	Aroclor 1254	Stat	Aroclor 1260	Stat	Total PCB	Comments
CW28	0-6	mg/Kg-dry	< 0.0433		< 0.0433		< 0.0433		< 0.0433		**0.594**		**0.26**		**0.108**		**0.96**	
CW28	12-18	mg/Kg-dry	< 1.02		< 1.02		< 1.02		**12.3**		< 1.02		**1.44**		**0.335**		**14.1**	Excavated and disposed at TSCA LF
CW28B	0-6	mg/Kg-dry	< 0.203		< 0.203		< 0.203		< 0.203		**1.41**		**0.444**		**0.15**	J	**2.00**	
CW28B	12-18	mg/Kg-dry	< 1.97		< 1.97		< 1.97		**16.7**		< 1.97		**1.8**	J	< 1.97		**18.5**	Excavated and disposed at TSCA LF
CW28B	18-24	mg/Kg-dry	< 0.0448		< 0.0448		< 0.0448		< 0.0448		< 0.0448		< 0.0448		< 0.0448		ND	
CW29	12-18	mg/Kg-dry	< 0.0412		< 0.0412		< 0.0412		< 0.0412		**0.421**		**0.194**		**0.0852**		**1.35**	
CW30	0-6	mg/Kg-dry	< 0.0409		< 0.0409		< 0.0409		< 0.0409		**0.452**		**0.198**		**0.0977**		**0.75**	
CW31	0-6	mg/Kg-dry	< 1.01		< 1.01		< 1.01		< 1.01		< 1.01		**3.13**		**0.7**	J	**3.83**	
CW32	0-6	mg/Kg-dry	< 1.03		< 1.03		< 1.03		**3.2**		< 1.03		**0.71**	J	< 1.03		**3.91**	
CW33	0-6	mg/Kg-dry	< 1.05		< 1.05		< 1.05		**2.45**		< 1.05		**0.52**	J	< 1.05		**2.97**	
CW34	0-6	mg/Kg-dry	< 0.198		< 0.198		< 0.198		**0.868**		< 0.198		**0.27**		**0.092**	J	**1.23**	
CW35	0-6	mg/Kg-dry	< 0.0396		< 0.0396		< 0.0396		< 0.0396		**0.42**		**0.171**		**0.0724**		**1.35**	
CW36	0-6	mg/Kg-dry	< 0.222		< 0.222		< 0.222		< 0.222		**1.86**		**0.434**		**0.18**	J	**2.47**	
CW38	0-6	mg/Kg-dry	< 0.205		< 0.205		< 0.205		< 0.205		**2.63**		**0.631**		**0.271**		**3.53**	
CW38	12-18	mg/Kg-dry	< 0.207		< 0.207		< 0.207		< 0.207		**0.669**		**0.317**		**0.19**	J	**1.18**	
CW39	0-6	mg/Kg-dry	< 0.192		< 0.192		< 0.192		< 0.192		**1.26**		**0.35**		**0.15**	J	**1.76**	
CW40	0-6	mg/Kg-dry	< 0.0401		< 0.0401		< 0.0401		< 0.0401		**0.685**		**0.383**		**0.14**		**1.21**	
CW52	0-6	mg/Kg-dry	< 0.0766		< 0.0766		< 0.0766		**1.03**		< 0.0766		**0.379**		**0.132**		**1.54**	
CW54	0-6	mg/Kg-dry	< 0.0398		< 0.0398		< 0.0398		**0.545**		< 0.0398		**0.18**		**0.112**		**0.84**	
CW110	0-6	mg/Kg-dry	< 0.0395		< 0.0395		< 0.0395		< 0.0395		**0.38**		**0.144**		**0.0577**		**1.35**	Dup of CW10
N1	0-6	mg/Kg-dry	< 0.947		< 0.947		< 0.947		**4.35**		< 0.947		**0.62**	J	< 0.947		**4.97**	
N3	0-6	mg/Kg-dry	< 0.0402		< 0.0402		< 0.0402		< 0.0402		**0.324**		**0.349**		**0.177**		**0.75**	
N4	0-6	mg/Kg-dry	< 0.0437		< 0.0437		< 0.0437		< 0.0437		**0.594**		**0.635**		**0.274**		**1.23**	
N5	0-6	mg/Kg-dry	< 0.995		< 0.995		< 0.995		< 0.995		**5.02**		**2.62**		< 0.995		**7.64**	
S1	0-12	mg/Kg-dry	< 0.206		< 0.206		< 0.206		< 0.206		**0.916**		**0.460**		< 0.206		**1.38**	Soil over tunnel
S2-4 comp	0-3	mg/Kg-dry	**0.480**		< 0.0408		< 0.0408		< 0.0408		< 0.0408		< 0.0408		< 0.0408		**0.480**	Soil over tunnel

Notes:

mg/Kg-dry - milligram per kilogram dry weight

< - parameter not detected above the specified value

PCB - polychlorinated biphenyls

Stat - data qualifier

J - estimated value

Bold - indicates a detection

Blue shading indicates concentration exceeds 9.4 ppm total PCBs

Appendix A

Photographs

amec foster wheeler

PHOTOGRAPHS

Amec Foster Wheeler
Environment & Infrastructure, Inc.
15933 Clayton Road, Suite 215
Ballwin, Missouri 63011
(636) 386-3800 Fax (636) 386-3804

Project Name: PSC Metals
Project No: 242415100
Location: Festus, MO.
Photographer: Derek Nees
Date: 05/21-22/2015

Description:

Concrete sample collection on pad next to baler foundation

Description:

Pad sample collection locations - Area C

amec foster wheeler

PHOTOGRAPHS

Amec Foster Wheeler
Environment & Infrastructure, Inc.
15933 Clayton Road, Suite 215
Ballwin, Missouri 63011
(636) 386-3800 Fax (636) 386-3804

Project Name: PSC Metals
Project No: 242415100
Location: Festus, MO.
Photographer: Derek Nees
Date: 08/20/2015

Description:

Sample locations, lower level floor, Baler Basin

Description:

Sample locations, east wall lower level, Baler Basin

amec foster wheeler

PHOTOGRAPHS

Amec Foster Wheeler
Environment & Infrastructure, Inc.
15933 Clayton Road, Suite 215
Ballwin, Missouri 63011
(636) 386-3800 Fax (636) 386-3804

Project Name: PSC Metals
Project No: 242415100
Location: Festus, MO.
Photographer: Derek Nees
Date: 07/23-30/2015

Description:

Sampling Grid
west side

Description:

North edge of Slab C

amec foster wheeler

PHOTOGRAPHS

Amec Foster Wheeler
Environment & Infrastructure, Inc.
15933 Clayton Road, Suite 215
Ballwin, Missouri 63011
(636) 386-3800 Fax (636) 386-3804

Project Name: PSC Metals
Project No: 242415100
Location: Festus, MO.
Photographer: Derek Nees
Date: 07/30/2015; 09/18/15

Description:

Area west of former Baler Building, prior to paving with concrete in August – September 2015

Description:

Example of new concrete pavement (view of area southwest of former Baler Building)